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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ROBERT PONZIO, KARINA  
KLOCZKO, JESSICA IRENE  
MILLER, ALEX ACUNA, BRIAN  
MADSEN, VANESSA M.  
MONTGOMERY, ROBERT MULL  
HADIYA NELTHROPE, and  
SAMUEL SALGADO, on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

vs.

MERCEDES-BENZ USA, LLC and  
DAIMLER AG,

Defendants.

No. 1:18-cv-12544-JHR-JS

*Document Electronically Filed*

**MOTION DATE:** January 19, 2021

**DEFENDANTS DAIMLER AG AND  
MERCEDES-BENZ USA, LLC'S  
NOTICE OF EXPEDITED MOTION  
TO STAY PENDING APPROVAL  
OF NATIONWIDE CLASS  
SETTLEMENT IN OVERLAPPING  
CLASS ACTION PROCEEDING**

*Oral Argument Requested*

**TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that on January 19, 2021, the undersigned, attorneys for Defendants Mercedes-Benz USA, LLC (“MBUSA”) and Daimler AG (“Daimler”) (collectively, “Defendants”), shall apply to the Honorable Joseph H. Rodriguez, United States District Court Judge, District of New Jersey, in Courtroom 5D of the Mitchell H. Cohen Building & U.S. Courthouse located at 4<sup>th</sup> & Cooper Streets, Room 1050, Camden, NJ 08101, and seek entry of an Order to stay this action pending approval of a proposed nationwide class action settlement in *Pinon v. Daimler AG and Mercedes-Benz USA, LLC*, No. 1:18-cv-03984, Dkt. No. 70 (N.D. Ga. filed Dec. 21, 2020).

**PLEASE TAKE FURTHER NOTICE** that in support of the Motion, Defendants shall rely on the accompanying Brief in Support of Motion, the concurrently filed Exhibits A-F, Proposed Form of Order, and all other pleadings and memoranda on file in this matter.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested for this motion.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that a certificate attesting to the date and manner of service of these moving papers is submitted herewith.

Dated: December 21, 2020

/s/ Thomas J. Sullivan

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***Attorneys for Defendants  
MERCEDES-BENZ USA, LLC and  
DAIMLER AG***

**CERTIFICATE OF SERVICE**

I hereby certify that on this 21st day of December, 2020, the foregoing was filed and served on counsel of record via the Court's ECF system:

Dated: December 21, 2020

/s/ Thomas J. Sullivan  
Thomas J. Sullivan